

**Mount Pleasant Office**

131 S. Main St.  
Mt. Pleasant, MI 48858  
Tel: 800.962.7022  
Fax: 989.779.2300

**Crystal Office**

122 W. Lake St.  
Crystal, MI 48818  
Tel: 800.828.3745  
Fax: 989.235.5151

**December 28, 2017**

**Federal Communications Commission**

**445 12th Street SW**

**Washington, DC 20554**

**Public Comments of CMS Internet LLC Proceedings: 17-258**

Dear Chairman Pai and Commissioners Carr, Clyburn, O’Rielly and Rosenworcel,

CMS Internet LLC is a small, independently owned Internet Service Provider located in Central Michigan. CMS began offering dialup Internet service in 1997. In the early 2000s, CMS deployed its first fixed Wireless network in a single town, and since that time has expanded to cover parts of eight counties throughout Central Michigan. With approximately 3000 fixed wireless subscribers and growing, CMS provides an invaluable service for rural customers who have limited options for broadband. CMS targets its fixed wireless deployments in rural communities where fiber and cable isn’t available, thus leaving only satellite and cellular service(s) as the only alternative option.

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[www.mycms.net](http://www.mycms.net)

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We currently offer speed plans of 3M, 5M, 10M and 20M on the majority of our network with monthly pricing from \$39.95 up to \$99.95 per month. In select areas, we offer 75M service for \$50/month and 100M service for \$75/month. Over the past year, we have seen a large uptick in 10M and 20M subscriptions. Data usage per customer nearly doubled from 2016 to 2017. In the areas we offer 75 and 100 Mbps service, the positive reception has been overwhelming. In light of these recent trends, it is clear that moving forward, the demand for speeds at or above the broadband benchmark of 25 Mbps will continue to soar.

CMS rolled out its first WiMAX network operating in the 3.65 – 3.70 GHz band in August 2009. Since that time, we have invested over a million dollars in our WiMAX infrastructure. When the FCC outlined the initial framework for CBRS in April of 2015, CMS continued to invest heavily in the 3.65 – 3.70 GHz band based directly on those rules. Access to the 3.550 – 3.650 GHz band outlined by CBRS will be paramount in our ability to meet the ever-growing needs of our end users. As such, CMS is ready to make significant investments in an LTE-based fixed wireless network, across our entire coverage territory leveraging this band, provided the rules concerning the geographic area of PALs remain based on census tracts.

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We look forward to the opportunity to bid on PALs that are in our immediate coverage territory and perhaps slightly beyond. Access to 100 MHz of mid-band spectrum will be a game changer for our continued efforts to bring *unlimited* 25 Mbps and above service to our current and future customer base at an affordable cost. Provided we are able to successfully acquire PALs, we plan to offer 25 Mbps as a base plan, and also offer speeds of 50M and 100M network wide, focusing on areas that cannot get cable and/or fiber service. Keeping the PAL geographic size within reason will be essential in our ability to effectively bid on and acquire PALs for our planned LTE network.

In addition to meeting the throughput demands of our end users, an LTE based network operating in the 3.550 – 3.650 band will enable CMS to reach thousands of new customers that otherwise cannot get our service due to terrain, thanks to the non-line-of-sight (NLOS) capabilities and clean spectrum of a LTE based 3.550-3.650 GHz network.

In summary, we at CMS Internet respectfully oppose increasing the geographic size of priority access licenses (PALs). In addition, we are

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against the proposal to lengthen the term of the license from 3 to 10 years. Keeping the CBRS framework in line with 2015 rules will enable CMS to best serve the needs of our underserved rural citizens.

Thank you for your time and consideration.

Jeremy Sheets  
President  
CMS Internet LLC

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